

Exhibit F

Joan Patricia Costello

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOHNN BASCI, et al.,

AFFIDAVIT OF
JOAN PATRICIA COSTELLO

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF SUSSEX)

JOAN PATRICIA COSTELLO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 58 Andover Road, Sparta, New Jersey 07871.

2. I am currently 81 years old, having been born on March 23, 1941.

3. I am the mother of James Nicholas Costello, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Jimmy passed away from pancreatic cancer on November 25, 2015. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Jimmy was a wonderful person. He made everything better by his presence. If he gave you a gift, it was always something extra special and thoughtful. Jimmy and I had a very close mother-son relationship. We would call each other and talk all the time. He was always busy with the FDNY. When he wasn't working, he was down at the Jersey Shore fixing up the house he purchased in 2012 that was destroyed by Hurricane Sandy. Jimmy was a very private

person about certain aspects of his life. I had no idea about his cancer until it was too late. I am still not sure if he knew about his illness.

6. Jimmy worked for the FDNY and responded to the World Trade Center site about a week after September 11th. He performed search and recovery operations on the pile, and he spent approximately a month down there. It was truly a terrible thing for him to experience, because so many of his friends had died in the attacks. Jimmy knew 150 of the 343 firemen who passed. I can't imagine how hard it was for him to work every day in the graveyard of his friends. He attended all his friends' funerals, and he became a special friend to their families in their time of sorrow. I was beyond proud of him. Jimmy was asked by the FDNY to write the 9/11 Report. He had to detail every firehouse's participation and a minute-by-minute account of their responses to the scene. Jimmy couldn't get away from thinking about 9/11 and the deaths of his friends for many years. It brought him so much sorrow. He didn't talk much about it, but I could hear it in his voice when we spoke.

7. I was aware for a while that Jimmy had suffered from GERD (Gastro-Esophageal Reflux Disease) as a result of his exposure at Ground Zero. He told me that he had to cancel a few ski trips he was planning because his GERD was acting up. Otherwise, he was a generally healthy person and worked hard to stay fit and active. The last time I saw him, in September 2015, he had lost some weight, but overall, he looked healthy. I had no idea that the cancer was festering inside of him. I didn't see Jimmy very much between September 2015 and his death in November 2015, but we often spoke on the phone. During our conversations, he would have a coughing fit. I became concerned and suggested he see a doctor. I thought maybe he had pneumonia. I had no idea that he was suffering from neuroendocrine pancreatic cancer. I was completely devastated when I learned about the cancer at the time of his death.

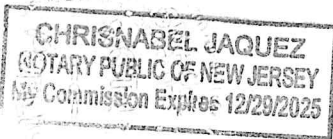
8. If I had known about Jimmy's illness, I would have done everything in my power to help him and take care of him. He was my child. There was nothing I wouldn't have done for him. As far as I know, he didn't undergo any cancer treatment. I still don't know how long he was sick with cancer, or even if he knew that he had it. My heart aches to think about him going through such a terrible ordeal by himself. He must have felt so alone, and that truly breaks my heart. I learned of his cancer at the time of his death. After all this time, I am still in shock. It is so unfair that he was taken from me before I had a chance to help him. I'm sure there were signs I missed, which only makes me feel guilty.

9. Jimmy was pure joy and love. He was a wonderful person who suffered a lot of anguish following 9/11, and he suffered his illness in silence. He is sorely missed every day. I can't tell you how much I loved my son. His death has just shattered me. I appreciate him more and more every day because he was such a wonderful person.


JOAN PATRICIA COSTELLO

Sworn to before me this
13 day of May, 2022


Notary Public



Timothy Patrick Costello

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

**AFFIDAVIT OF JOAN PATRICIA
COSTELLO on behalf of
TIMOTHY PATRICK COSTELLO**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF SUSSEX)

JOAN PATRICIA COSTELLO, being duly sworn, deposes and says:

1. Timothy Patrick Costello is a plaintiff in the within action, is over 18 years of age, and resides at 58 Andover Road, Sparta, New Jersey 07871. Due to Timothy's cognitive impairment, I submit this Affidavit on his behalf.

2. Timothy (Timmy) is currently 51 years old, having been born on January 8, 1971.

3. He is the brother of James Nicholas Costello, upon whose death his claim is based, and submits this Affidavit in connection with the pending motion for a default judgment and in support of his solatium claim.

4. James Nicholas Costello passed away from pancreatic cancer on November 25, 2015. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Timmy is eight years younger than Jimmy. They shared a very nice relationship. Jimmy moved to the city after he graduated college, but he still often called home to check on his younger brother. Timmy and Jimmy had a mutual love of music. Jimmy had a huge music collection and would let Timmy play all of his records. Timmy loved that.

7. Jimmy worked for the FDNY and responded to the World Trade Center site about a week after September 11th. He performed search and recovery operations on the pile, and he spent approximately a month down there. Timmy knew about 9/11 and understood what happened on that day. He knew that it was a terrible day and that people died. Timmy understood that Jimmy was involved in the recovery efforts following 9/11.

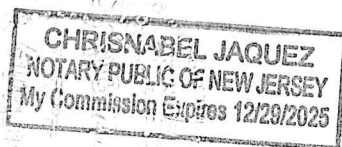
8. Timmy's cognitive disability kept him from fully understanding the nature of Jimmy's death, but he was still very saddened and became depressed.

9. I know that Timmy really loved his brother and appreciated his brother's role in his life. Jimmy was very generous to Timmy, and it always made Timmy happy to listen to music with his brother. As much as Timmy was capable of feeling sorrow for his brother's passing, it was obvious that he truly did.


JOAN PATRICIA COSTELLO
on behalf of TIMOTHY PATRICK COSTELLO

Sworn to before me this
13 day of May, 2022


Notary Public



Kathleen T. Costello-Patire

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

**AFFIDAVIT OF KATHLEEN T.
COSTELLO-PATIRE**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF SUSSEX)

KATHLEEN T. COSTELLO-PATIRE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 113 Overlook Road, Newton, New Jersey 07860.

2. I am currently 53 years old, having been born on May 18, 1968.

3. I am the sister of James Nicholas Costello, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from pancreatic cancer on November 25, 2015. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Jimmy and I were extremely close. He was my idol. I bragged about him non-stop. I was so proud of him when he went to law school. He worked full-time, studied his butt off for all his exams for the FDNY, and moved quickly through the ranks. He was #2 on the Captain's Exam for the whole City of New York. He was also a phenomenal uncle to my three kids. They absolutely adored him. He was very involved in their lives. I spoke to Jimmy

frequently on the phone. He was truly one of the greatest people I've ever known.

6. Following the attacks on September 11th, Jimmy rushed to downtown Manhattan to respond, but all of the tunnels were shut. He was an active-duty FDNY fireman at the time. As soon as he was able to get to Ground Zero a few days later, he started working on the pile. He was there for a month performing search and recovery operations. I was very aware of his exposure, and I realized that the dust he was breathing in was very toxic. I thought it was odd that he wasn't wearing any gear to protect his breathing.

7. I had noticed that Jimmy had a cough for quite some time before 2015. I also saw that he was dropping weight, but I never in my wildest dreams imagined that he had cancer. He came to my daughter's soccer game three weeks before he passed away. He seemed alright despite his weight loss. Days later, a cleaning woman that was at Jimmy's house called me because she realized that something was wrong with his health. I told Jimmy to see a doctor, which he did. After Jimmy saw the doctor and had an x-ray, we received a call from a cousin of ours who works at Monmouth Hospital. He advised that Jimmy's x-ray revealed an enormous tumor on Jimmy's lung and that he had pancreatic cancer. To this day, we don't know if he was even aware that he had cancer, or if he was aware how much the cancer had spread.

8. We rushed over to the hospital where Jimmy was admitted. His eyes were yellow, and he was unresponsive. He passed away within an hour. We had no warning. We were in absolute shock. How could this have happened? The doctor didn't even have a chance to call us with Jimmy's biopsy results. We actually received that call the day after he died. It was surreal. I truly don't know if Jimmy knew he had cancer. Even if he did, he wouldn't have wanted to worry his family with the news.

9. Jimmy never wanted to complain. He was alive, but all his brothers from the FDNY were dead. So, he felt like that he was never justified in complaining. His loss had a huge impact on all our lives. Jimmy was like the glue in our family. Our father passed away seven months before Jimmy did, and Jimmy gave a beautiful eulogy. Now he was gone. It was like a nightmare I couldn't wake up from. Jimmy became withdrawn after our father died. I attributed it to his grief. I never knew it was because he was actually sick. Jimmy was like the patriarch of our family. He played such a big role in our family. He was like a father figure to his nieces and nephews. His death was devastating.

10. I remember so many kind and thoughtful things that Jimmy did. He took my daughter to the ballet, and even made homemade pasta for my kids before their track meets. One time he took my kids on a fishing trip. He caught and fried a fish for all the kids to eat. They were so excited. It was little things like that that Jimmy put his heart into. Everything he did was for his family and his loved ones. He truly went above and beyond. Life isn't the same without him. I miss him terribly.


KATHLEEN T. COSTELLO-PATIRE

Sworn to before me this
10 day of April, 2022


Notary Public

KIMBERLY M. ZITO
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES JULY 5, 2026

Ann Patricia Lazar

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

AFFIDAVIT OF
ANN PATRICIA LAZAR

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF SUSSEX)

ANN PATRICIA LAZAR, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 19 Old Creamery Road, Newton, New Jersey 07860.

2. I am currently 56 years old, having been born on February 27, 1966.

3. I am the sister of James (Jim) Nicholas Costello, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from pancreatic cancer on November 25, 2015, at the age of 52. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Jim and I have always had an extremely close relationship. We spoke on a regular basis. Jim was also an amazing uncle to my four children. He adored them, and they adored him right back. He was extremely in-tune with their lives. If they had something new going on in their lives, Jim reached out to them to hear all about it. He was a hero to them. He was a hero to our entire family.

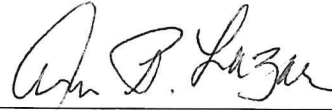
6. Jim was out of town on September 11, 2001. At the time, he was an active-duty FDNY firefighter, and I knew that as soon as he heard about the attacks, he'd be rushing to the World Trade Center site to help. That's who he was. It made me a little nervous. I kept trying to call him but couldn't reach him because the cell lines were down. When I finally did get in touch with him, he told me that he couldn't even get into the city. I was so relieved to know that he was safe that I started sobbing uncontrollably on the phone. He didn't give up, however, and went as soon as he could get to Ground Zero. He was determined to get there and help find his fallen brothers in the pile. He spent about a month working on the pile. He said it was like being in hell. The buildings and the people were all pulverized into a million bits. Jim was also tasked with formally notifying the families of FDNY firemen that their loved one's body had been identified in the rubble. He worked on the FDNY 9/11 Report for over three years.

7. At first, we weren't aware that Jimmy wasn't feeling well. He was never a complainer and didn't want to worry us. In 2015, I was planning to have Thanksgiving at my house. I was on the phone with him making plans when he broke into a terrible coughing fit. I told him to call the doctor, which he did. He was given a prescription, but it didn't make him any better. I thought he had pneumonia and suggested that he get an x-ray. Not long after taking the x-ray, I received a call that Jimmy was hospitalized and in serious condition. I soon realized that he wasn't going to make it. I was frantic. I got to the hospital just in the nick of time to say goodbye to him. It was horrible. Jimmy looked like a skeleton. I had no idea what was going on. I couldn't believe that he had lost that much weight. I had no idea how sick he really was. It was shocking.

8. Literally within a matter of days, my brother was sick and then dead. It was so hard to comprehend. I'm grateful that I got to say goodbye to him and that he knew we were all there with him. Still, I feel like our family was robbed of him. He had so much more life left to live. Before he got sick, Jimmy went to law school to help firemen who were suffering from the health effects of working at Ground Zero. But in the end, he was a victim of the same thing. There's not a holiday, birthday, or milestone that goes by that we don't say, "There's the empty seat that Jimmy should be sitting in."

9. Our family is very proud of Jimmy and his legacy. He was a great person. At his funeral, there must have been three hundred people who came up to me and said, "Your brother was like my best friend." I can't imagine another person making that kind of impact. My brother

touched so many lives during his time on earth. We are proud of him and his memory. I hope my kids carry his memory with them into their lives. I hope my children can live half as good a life as Jimmy lived.



ANN PATRICIA LAZAR

Sworn to before me this
13 day of ~~April~~, 2022
May



Notary Public

CHRISNABEL JAQUEZ
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 12/29/2025

Nancy Marie Bukowski-Strandin

6. Following 9/11, the operating engineers were the first ones to come in after the first responders to help with the clean-up. My husband was among them. John had been on the pile for 9 or 10 months, during which time he saw many horrific and graphic things. Breathing in the many carcinogens at the World Trade Center site for such a prolonged period of time ultimately led to him developing Stage IV throat cancer. Seeing severed body parts led to him having severe PTSD. Despite the daily horror, John continued to work and did what he had to do.

7. In late 2008, I noticed my husband beginning to have issues with his throat. He was always complaining about his throat. Right before Thanksgiving, he decided to go to the doctor to get an injection to get rid of a throat infection. The injection had little effect, leading him to go to the WTCHP at Stony Brook for lab work. By February of 2009, Stony Brook recommended that he see an ENT, who diagnosed him with Stage IV inoperable throat cancer. Thirty-three radiation treatments and four chemotherapy treatments ravaged his body. These treatments depleted his white blood cell count and forced him to be on a feeding tube. He would remain on a feeding tube for the remainder of his life. He quickly went from being a strong 230 pounds to a weak 100 pounds.

8. John's illness changed me forever. Simply talking about his illness is enough to bring me to tears. It is really hard for me. I will never be the same. John and our kids were my everything. I really couldn't bear the thought of losing him.

9. John's illness impacted our entire dynamic. Our relationship changed from being a couple to being a patient and caregiver. It put a strain on our everyday life. I was his primary caretaker when he wasn't in the hospital. I would go to work in the morning and then come home at 3 p.m. to help him bathe and insert his feeding tube. I tried to teach him to do it himself, but it was difficult for him. The kids would help him get around because he was too weak to walk. I had three jobs just to make ends meet. In addition to taking care of John, I had to juggle family, everyday household chores, shopping, lawn work, and everything to do with maintaining a house. To say it was stressful is an understatement.

10. John left a wonderful legacy for our children. He was a strong man with a heart of gold, who regularly worked with the FealGood Foundation. He didn't deserve to get sick. He was an awesome role model, and a great father. It hurts me that my children lost their father. He

is sorely missed every day. Losing John was a really tough time in all of our lives.

Nancy Marie Bukowski -
NANCY MARIE BUKOWSKI-STRANDIN
Strandin

Sworn to before me this
9th day of May, 2022

Nichole M. Moore
Notary Public



NICHOLE M. MOORE
Notary Public, State of Ohio
My Commission Expires:
Aug. 24, 2026

Kurt George Haberland

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

AFFIDAVIT OF
KURT GEORGE HABERLAND

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)
 : SS.:
COUNTY OF ALACHUA)

KURT GEORGE HABERLAND, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 10115 NW 206th Avenue, Alachua, Florida 32615.
2. I am currently 69 years old, having been born on August 29, 1952.
3. I am the brother of Wayne Kenneth Haberland, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My brother passed away from interstitial lung disease and leukemia on February 8, 2005, at the age of 49. It was medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Wayne and I had a close relationship. My wife, children, and I often visited him on Long Island. We enjoyed staying over at his house and swimming in his pool. My brother was a computer expert and introduced me to computer programming. We liked playing guitar together. When we were young, we started a little band. Wayne and I played the guitar, and our younger brother played the drums. It was a great time. Although Wayne lived in New York and I lived in Florida, we would always talk on the phone. He planned to move down to Jacksonville to be closer to us, and he was excited about becoming a Jaguars fan. Our aging mother planned to move to Florida, and Wayne had plans to move down here and help me take care of her. Unfortunately, that didn't work out. What happened to Wayne is still so upsetting because he had so many life plans. It's terrible that his life was cut so short. He wasn't even 50 years old when he died.

6. During the World Trade Center attacks on 9/11, Wayne worked right down the street. The whole situation was extremely stressful. I remember turning on the TV and seeing that the second plane hit the World Trade Center and watching the first tower fall. My family and I immediately started to worry about Wayne. It took us two days to learn whether Wayne had survived the attacks, which was very stressful. When the officials said the air was clean, he returned to his office right away. Wayne was very into his work, and he wanted to get back to the office as soon as possible.

7. Wayne's health started to change almost immediately after 9/11. He was very healthy before then and careful about his health. He was very into healthy food and highly athletic. He practiced Tai Chi, karate, and aikido. Hearing how his health was deteriorating was scary. Our mother was also sick at the time, and I was her full-time caretaker, so I couldn't physically be there for him as much as I would have liked, but I offered as much emotional

support as I could each time we spoke. When Wayne was diagnosed with leukemia, we decided not to tell our mother because we believed she could not handle that news.

8. I was always in touch with Wayne, but the extent of how fast and aggressive his health problems were didn't hit me until he was almost gone. I could hear how little energy he had. He could no longer work and had to leave his job, which threw him for a loop. When I visited him, I saw that he didn't even have the energy to play the guitar. He had a hard time even moving his fingers, and his joints were still, and his hands were frail. He tried to downplay it, but he was suffering a lot. That was so difficult for me to witness.

9. His illness and passing were extremely upsetting—such a senseless loss. Wayne worked very hard at his job. He put in many hours to be successful and support his family. He was always there for his wife, Terese, brothers, mother, nieces, and nephews. When he died, Terese and I tried to console each other. But it's hard when the person who holds the family together is no longer there. He was great support for all of us. Now, I can't even pick up the phone and talk to him. All I can do is look at the pictures and think, "Oh, how the time has flown by." The life he could have had and enjoyed with his family was cut short.

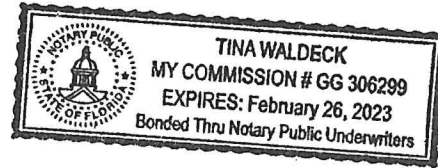
10. Wayne is greatly loved by all of us. He was a good man. It saddens me to think of how short his life was. I feel great pain over his loss and for his wife, Terese, who loved him very much. I also feel sad for my children, who didn't get to know their uncle the way they should have. He could have taught them so much. He should still be here. Unfortunately, that is

the uncertainty of life.


KURT GEORGE HABERLAND

Sworn to before me this
21 day of June, 2022


Notary Public



Danielle Harcourt

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

**AFFIDAVIT OF
DANIELLE HARCOURT**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF SOMERSET)

DANIELLE HARCOURT, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11 Battle Hill Road, Basking Ridge, New Jersey 07920.

2. I am currently 52 years old, having been born on July 26, 1969.

3. I am the wife of Charles Harcourt, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from liver cancer on May 30, 2014, at the age of 51. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Charles and I married in 1991 and had our first child in 1993. We raised four beautiful children in total. He and I were very active in our community. Our children were all very athletic. We would go from baseball games to softball games to dance recitals, basketball games, wrestling matches and hockey games. My husband was a coach and very involved in all of it. Charles even started a program called Ridge Youth Sports. My husband and I also had a

beautiful personal relationship. We always made sure to make time for ourselves, even after we were busy with the kids all day. We enjoyed going out and having "couple time." My husband worked several jobs, but ultimately landed at Morgan Stanley. He was very well-respected at work. Charles was excellent at balancing family and work.

6. On September 11th, 2001, he went to work in the World Trade Center as usual. He always left early in the morning so he could beat the rush hour traffic. Charles was at his desk and called me after the first tower was hit. He said, "Port Authority is telling us it's an isolated incident and that we should stay put." So, he stayed put. He told his business partner to hurry down the stairs because he feared that if it wasn't an isolated incident, she may not be able to make it out in time. He stayed to assist other people out of the building. He was actually caught on security camera footage carrying people down the stairs. I was in a complete state of panic all morning because cell service was down, and I didn't hear from him until about 1:00 p.m. that afternoon. He was able to make it out, and we were both extremely grateful for that. Morgan Stanley had to relocate their offices to another building in lower Manhattan after the attack. Charles returned to an office within the exposure zone the following Thursday. The building was located right near the Holland Tunnel. Charles would often come home with a persistent cough and not feeling well.

7. In 2012, my husband started experiencing short of breath, and we took him to the hospital for some tests. He was diagnosed with Stage IV liver cancer on his birthday, September 26, 2012. The diagnosis could not have been more of a devastating shock. Charles underwent radiation treatments. We were told that was all they could do for him at that point. He was also put in a case study and took an experimental chemo pill to see if it would help with his advanced cancer. Unfortunately, it did not.

8. Since I had four young children to take care of, and now Charles, I decided not to go back to work. I quit my job in October 2012. I wanted to take care of my husband full time. I took him to all of his doctor appointments and cared for him until the day he died. I helped him with all of the things he couldn't do for himself, like going up and down the stairs, getting to the bathroom, showering, bathing and getting in and out of bed. We hired tutors for the kids because we could no longer sit with them and do homework. We had to rely on others to take our kids where they needed to go and had to hire outside contractors for landscaping and to

clean our house – all the things I would have done myself, but I needed to spend that time taking care of Charles.

9. When you hear the words, “You have terminal cancer. There’s nothing we can do for you” said to your loved one, it is absolutely terrifying. Charles and I had planned to grow old together and, once the kids got older, hoped to reignite our relationship to the way it was before we had kids, when it was just the two of us. Our kids were the absolute joy of our lives. We took great pride in our children. But we always looked forward to the second half of our lives, when we could enjoy not only each other, but also grandkids. We were deprived of that. It’s tragic. I was forty-five years old when my husband died. You’re not supposed to lose your spouse when you’re forty-five.

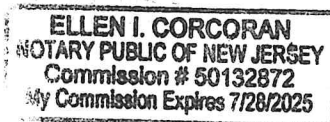
10. Life continues to be extremely challenging with Charles gone. My daughter got married, and her father wasn’t here for it. She is now having a baby, and father won’t be here for it. My son just had his first hit as a college baseball player, and his father wasn’t here for it. My other son has been playing college hockey, and his father isn’t here to watch him. My son’s first wrestling match was right after Charles died. After he won his match, he ran outside and sobbed uncontrollably. My heart broke for him. It’s true that you’re only as happy as your least happy child. Knowing that my children will always be suffering with the death of their dad, I will always be suffering along with them. It’s difficult every day.

11. Charles was so active in our community and touched so many lives. Our town has a memorial for him on the football field every year and even established a scholarship in his name. We get together every September 11th with people he worked with and talk about all the memories we have of him. He is truly missed, and, honestly, I miss him the most.


DANIELLE HARCOURT

Sworn to before me this
12 day of May, 2022


Notary Public



Kelsey Alexandra Harcourt

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOHNN BASCI, et al.,

**AFFIDAVIT OF
KELSEY ALEXANDRA
HARCOURT**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
: SS.:
COUNTY OF HUNTERDON)

KELSEY ALEXANDRA HARCOURT, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 5 Pearl Street, Whitehouse Station, New Jersey 08889.

2. I am currently 28 years old, having been born on August 2, 1993.

3. I am the daughter of Charles Harcourt, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from liver cancer on May 30, 2014, at the age of 51. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was 20 years old when my father passed away.

6. I am the oldest child and the only girl. Because of this, I was very close to my father. I was his princess, and he called me "boots." Although my dad worked a lot, it never stopped him from being at everything for me. He brought all of my siblings to all of my cheer competitions and dance recitals. This wasn't easy since they were all boys and not the least bit

interested in any of it. My dad was always there for me. As long as I earned it, he got me everything I wanted. He taught me how to be kind. When I was in college, I would often call my mom for advice, but then I'd get a voicemail from my dad reminding me that he was there for me too. I loved that. We had a special relationship.

7. September 11, 2001, started out as a normal day for my father. He went to work at his office located in south tower of the World Trade Center. He actually witnessed the plane crash into the north tower of the WTC. He thought immediately that everyone should evacuate the south tower, but he was told by the Port Authority to stay put. When it did come time to evacuate, he helped carry people out who could not evacuate on their own. I was in grade school when this all happened and didn't understand the magnitude of it all. I later learned of the horrors that he had experienced that day. I remember him spending that night pacing back and forth and repeatedly checking on me and my siblings. He often spoke of witnessing a man in a tie jump to his death from one of the towers. Because he witnessed so many traumatizing things that day, my father suffered from PTSD and survivors' guilt.

8. I learned of my father's diagnosis when I was a sophomore in college. I was having a hard time being at school when everyone else was at home. After I had a particularly bad night, my family decided to come up to visit. My dad was quiet and didn't say much at dinner, which was very unlike him. As soon as they got back home, my dad called me and told me he had cancer and that it was terminal. I fell to my floor screaming and crying. My roommates tried to calm me down, but they couldn't. I drove home that night. I was so upset that I'm not really sure how I made it home safely. When I arrived home, everyone was in the kitchen waiting for me. My father told me more about his cancer. It was bad. I felt my heart ripping apart for him. I went with him to his next doctor's appointment. I was there when he received his stage IV diagnosis from the doctor. We all broke down except for him. He stayed stoic and strong for us.

9. After my father's diagnosis, caring for my family became my number one priority. As the oldest child, I had to be there for my mother and brothers. I came back and forth from college almost every weekend to help take care of him. I took over helping with my brothers so my mother could help with my dad. I would drive my brothers to wherever they needed to go, whether it was school, sports, or somewhere in between. My dad would try to get

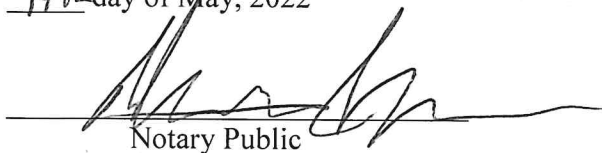
me to do things with him that he knew my mother and brothers wouldn't do, like going on walks and getting him up and down the stairs. He even jokingly asked if I'd help to try to sneak him out of the hospital. I missed out on a lot of college stuff. That all had to take a back seat. I wasn't able to get a job either because I wanted to always be available to help out. My time was dedicated to my family.

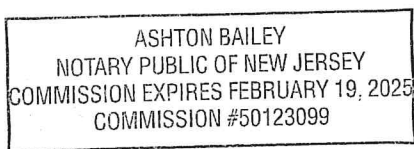
10. Emotionally, it was tough. It continues to be tough. Being the oldest, I felt there was a role thrust on me that made it hard to not be at the house. I did not like to be away from the house too long, or even go on vacation, because I feared what I would come home to. I still feel that way when I vacation today. I tried to stay afloat as much as I could for my mother and brothers. I still try to stay present for them, knowing my father cannot be. My dad lost his father at the same age I lost him. We actually talked about that a lot. He tried to prepare me for his passing. Even with our talks, nothing could prepare me for that pain. My father missed my wedding. He will never know his first grandchild. This haunts me. I will always wish that he could know them and them him.

11. For me, his legacy is in the five of us. His kids and our mom. He had a dog named "Honey," so we got a dog and named it "Honey." He is in everything we do. He struggled a lot after 9/11. It changed him as a person and a dad. It made him more emotional. In turn, he taught us that it's okay to be vulnerable and talk to somebody. I will always appreciate him for that. I will miss him forever.


KELSEY ALEXANDRA HARCOURT

Sworn to before me this
19th day of May, 2022


Notary Public



Kevin Harcourt

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

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JOHNN BASCI, et al.,

**AFFIDAVIT OF
KEVIN HARCOURT**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF SOMERSET)

KEVIN HARCOURT, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11 Battle Hill Road, Basking Ridge, New Jersey 07920.

2. I am currently 21 years old, having been born on July 28, 2000.

3. I am the son of Charles Harcourt, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from liver cancer on May 30, 2014, at the age of 51. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was 13 years old at the time of my father's death.

6. One of my first memories with my dad was watching the New Jersey Devils win the Stanley Cup. My dad introduced me to hockey. It is my greatest love still today. I remember scoring my first goal and seeing him, and only him, in the stands. To me, it was as though no one else was there. My dad also introduced me to golf, another of my loves. I have natural

athletic ability today because of him. He taught me that great rewards come from hard work. My dad worked hard to save money so we could go on vacations every year. He was a very prideful man and didn't show many emotions. He hid a lot from us so we could live normal lives. Over time, this changed, and he began to show his emotions. He taught me that showing emotion is a good thing.

7. I was less than a year old on September 11th, so I have no memory of anything that occurred that day. I learned from my dad, however, that it started out as a normal day. He went to work at his office, which was located in south tower of the World Trade Center. He witnessed the plane crash into the north tower and immediately wanted to evacuate the building, but he was told by Port Authority to stay put, which he did. When it did come time to evacuate, he helped carry people out who could not evacuate on their own. I remember anytime I would watch the movie "Miracle" with my dad, he would always break down when the World Trade Center was shown. It was hard for him.

8. The day I learned of my dad's cancer started out like any other. We had visited my sister at college. It seemed like a normal day. My dad hadn't said too much, which was kind of strange for him. We drove back to New Jersey, and I went to hockey practice. My mom didn't pick me up from practice that day, which she normally did. Instead, a family friend took me home. When I got back, I noticed my sister's car was there, which I did not expect since we had just visited her. I was the last to find out that my dad had cancer. It was very hard for me. He sat me down and tried to assure me that everything would be okay. I wanted to believe him, but I felt scared. That night was very hard for me.

9. At 13 years old, there wasn't much that I could do to help with my dad's illness. I was at an age where my friends were very important. I gladly sacrificed my time with my friends in order to be with my family more. I missed out on some good times with my friends.

10. I lost my father at the age of 13, too young for a boy to lose his father. It was hard on me. Before my father passed away, we sat down and discussed my future. We made the decision that I would attend an all-boys school. I would never have another father figure in my life, but it was important to him I had strong male role models to learn from. He wanted to make sure I was looked after even after he was gone. My father could never be replaced, but I admit that learning from these men helped me grow into a man myself. Still, it hurts. My dad will

never see me play another hockey game. He will never see me get married or meet any of my children. I hope I am as good a dad to my future children as he was to me. Losing him was the hardest impact of my life.



KEVIN HARCOURT

Sworn to before me this
12 day of May, 2022



Notary Public



Kyle Harcourt

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOHNN BASCI, et al.,

**AFFIDAVIT OF
KYLE HARCOURT**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF SOMERSET)

KYLE HARCOURT, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11 Battle Hill Road, Basking Ridge, New Jersey 07920.

2. I am currently 26 years old, having been born on December 10, 1995.

3. I am the son of Charles Harcourt, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from liver cancer on May 30, 2014, at the age of 51. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was 18 years old at the time of my father's death.

6. My father was a very active part of my life. He was active with all of his children. We were all involved in sports, and he loved going to every one of our sporting events. My dad and I had a tradition of getting donuts before all of my wrestling matches. That always made those early mornings easier. My dad introduced me to two of my favorite things – football and

fishing. He had a way of making everything interesting and fun. When I chose to join our local fire department, my dad was there for me. Even though he wasn't crazy about the idea of me joining the fire department because of his feelings about 9/11, he was still there for me. He supported me always.

7. On September 11th, my dad went to work as usual. He worked in the south tower of the World Trade Center. He witnessed the plane crash into the north tower. His entire building shook. He wanted to immediately evacuate the south tower, but was told to stay put by the Port Authority. When it did come time to evacuate, he helped carry people out who could not evacuate on their own. I was only 5 years old at the time, but I remember watching everything on TV. We were all so relieved when he made it home that day. Eventually, he did go back to work in another building down by ground zero. Although he didn't want to, he did it so he could continue to support his family.

8. I was in high school when I learned of my father's illness. My parents sat my siblings and me down in the family room and told us the news. Dad had cancer. It was hard. It never got any easier either. Our lives were changed forever. Being in high school, I did what I could to help care for my dad and my family. I had my driver's license, so I was able to drive him to and from his doctor appointments, if needed. If he ever wanted anything from the store or a refill on his medication, I would go out and get it. I also helped with my younger siblings, driving them wherever they needed to go. I stopped working as much as I would normally so I could be there for my family. We all sacrificed our time and energy to be there because my father would have done the same for us in a heartbeat.

9. My father's illness was very tough on me. I am his oldest son. Being that, I felt I had to step into the fatherly role. I felt it was necessary for my siblings. It was emotionally draining for me though. It was difficult to try to do things as normal. His illness was always weighing on me. The pressure to step up into a bigger role weighed on me also. I lost some of the innocence of youth answering that call. I miss my dad so much. He was taken from our family far sooner than he should have been. September 11th changed my life forever. I will

never be the same because of it.


KYLE HARCOURT

Sworn to before me this
12 day of May, 2022


Notary Public

